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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

EDGAR GUEVARA and LORENA M. GUEVARA,
individually and on behalf of all others similarly situated,

Plaintiffs, Case No. 15-CV-02895 (GRB)

- against -

SIROB IMPORTS, INC., NICK BOBORIS and PETER
BOBORIS,

Defendants.

**NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF
CLASS AND COLLECTIVE ACTION SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Class and Collective Action Settlement and in the Declaration of Steven J. Moser in Support thereof (Moser Decl."), the Plaintiffs respectfully request that the Court:

1. grant preliminary approval of the Class And Collective Action Settlement Agreement ("Settlement Agreement"), attached as Exhibit 2 to the Moser Declaration;
2. preliminarily certify the following settlement class under Fed. R. Civ. P. 23(a) and (b)(3) for purposes of effectuating the settlement:

[A]ll nonexempt and/or hourly employees, other than managers, corporate officers, and directors who performed work for Sirob Imports, Inc. at any time during the period from May 19, 2009 until October 19, 2019;

3. approve of the proposed class action notice annexed as Exhibit B to the Class Action Settlement Agreement (Exhibit 2 to the Moser Declaration) and distribution thereof to the class members;

4. set the date for the final fairness hearing;

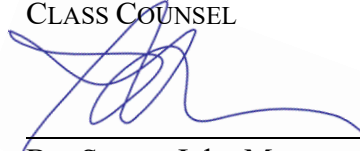
5. approve the proposed class action settlement procedure; and

6. grant such other, further, or different relief as the Court deems just and proper.

The Parties have submitted a Proposed Order, attached to this Notice of Motion for the Court's convenience.

Dated: Glen Cove, New York
February 3, 2020

Respectfully submitted,
MOSER LAW FIRM, P.C.
CLASS COUNSEL



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